

**KIM GILBERT EBRON**  
7625 DEAN MARTIN DRIVE, SUITE 110  
LAS VEGAS, NEVADA 89139  
(702) 485-3300 FAX (702) 485-3301

DIANA S. EBRON, ESQ.  
Nevada Bar No. 10580  
E-mail: diana@kgelegal.com  
JACQUELINE A. GILBERT, ESQ.  
Nevada Bar No. 10593  
E-mail: jackie@kgelegal.com  
KAREN L. HANKS, ESQ.  
Nevada Bar No. 9578  
E-mail: karen@kgelegal.com  
KIM GILBERT EBRON  
7625 Dean Martin Drive, Suite 110  
Las Vegas, Nevada 89139  
Telephone: (702) 485-3300  
Facsimile: (702) 485-3301  
*Attorneys for SFR Investments Pool 1, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

THE WILLOWS HOMEOWNERS  
ASSOCIATION; SFR INVESTMENTS POOL  
1, LLC; and ABSOLUTE COLLECTION  
SERVICES, INC.,

Defendants.

Case No. 2:16-cv-00579-RFB-EJY

**NOTICE OF SETTLEMENT AND  
STIPULATION AND ORDER TO  
EXTEND STAY OF LITIGATION**

PLEASE TAKE NOTICE that Bank of America, N.A. ("BANA") and SFR Investments Pool 1, LLC ("SFR") have reached a global settlement in principal on multiple properties, including the Property at issue in this case. The settlement will resolve all claims between BANA and SFR.

BANA and SFR have agreed to stay the litigation for ninety (90) days to allow additional time to finalize settlement. This will also provide an opportunity for BANA to discuss the potential for settlement as to its claims against The Willows Homeowners Association (the "Association").

Accordingly, BANA, SFR and the Association (collectively the "Parties") are submitting the instant Stipulation and Order seeking to extend the already existing stay of litigation in this matter.

Pursuant to a Minute Order in Chambers issued on October 17, 2019, this case was

**KIM GILBERT EBRON**  
7625 DEAN MARTIN DRIVE, SUITE 110  
LAS VEGAS, NEVADA 89139  
(702) 485-3300 FAX (702) 485-3301

1 administratively stayed pending the result of the Nevada Supreme Court's order of en banc  
2 reconsideration in the case *Bank of America, N.A. v. Thomas Jessup, LLC Series VII*. [ECF No.  
3 63.] The Minute Order set a deadline of 30 days after the stay was lifted for refiling dispositive  
4 motions. [ECF No. 63.] The Nevada Supreme Court issued its Order of en banc reconsideration  
5 on May 7, 2020. *Bank of America, N.A. v. Thomas Jessup, LLC Series VII*, 462 P.3d 255 (Nev.  
6 2020) (unpublished disposition), thereby resolving that issue. While the issuance of the Order did  
7 not automatically lift the stay in this case, in an abundance of caution, the Parties hereby stipulate  
8 to vacate the dispositive motion deadline set by the Court's October 7, 2019, Order, and stipulate  
9 to extend the stay of litigation for ninety (90) days to allow additional time to finalize settlement.

10 ...

11 ...

12 ...

13 ...

14 ...

15 ...

16 ...

17 ...

18 ...

19 ...

20 ...

21 ...

The Parties further request the court set a deadline for filing a status report regarding the settlement for ninety (90) days from entry of this Stipulation and Order. This request to stay is being made in the interest of preserving judicial resources and, as set forth above, to allow additional time to finalize settlement. The Parties reserve the right to move to lift the stay and reinstate deadlines before the ninety (90) days if any of them choose to do so.

<p>DATED this 8th day of June, 2020.</p> <p><b>KIM GILBERT EBRON</b></p> <p><u>/s/ Jacqueline A. Gilbert</u>  JACQUELINE A. GILBERT, ESQ.  Nevada Bar No. 10593  7625 Dean Martin Drive, Suite 110  Las Vegas, Nevada 89139  E-mail: jackie@kgelegal.com  Attorneys for SFR Investments Pool 1, LLC</p>	<p>DATED this 8th day of June, 2020.</p> <p><b>AKERMAN LLP</b></p> <p><u>/s/ Holly E. Walker</u>  DARREN T. BRENNER, ESQ.  Nevada Bar No. 8386  HOLLY E. WALKER, ESQ.  Nevada Bar No. 14295  1635 Village Center Circle, Suite 200  Las Vegas, NV 89134  E-mail: darren.brenner@akerman.com  E-mail: holly.walker@akerman.com  Attorneys for Bank of America, N.A.</p>
	<p>DATED this 8th day of June, 2020.</p> <p><b>BOYACK ORME &amp; ANTHONY</b></p> <p><u>/s/ Patrick A. Orme</u>  EDWARD DEAN BOYACK, ESQ.  Nevada Bar No. 5229  PATRICK A. ORME, ESQ.  Nevada Bar No. 7853  7432 W. Sahara Ave., Suite 101  Las Vegas, NV 89117  E-mail: ted@boyacklaw.com  E-mail: patrick@boyacklaw.com  Attorneys for The Willows Homeowners Association</p>

### **ORDER**

IT IS SO ORDERED.

  
\_\_\_\_\_  
RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 9th day of June, 2020.

**KIM GILBERT EBRON**  
7625 DEAN MARTIN DRIVE, SUITE 110  
LAS VEGAS, NEVADA 89139  
(702) 485-3300 FAX (702) 485-3301